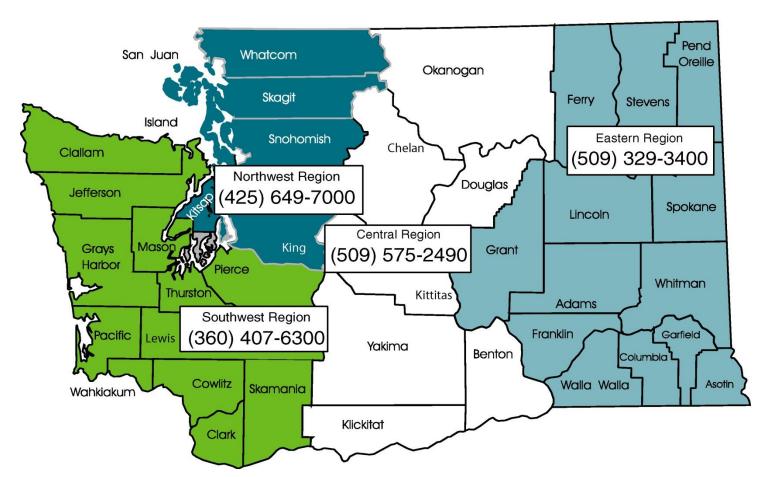


Dangerous Waste Management Tutorial

Ecology staff can help

 For more help on Dangerous Waste issues, call the Hazardous Waste and Toxics Reduction staff at your local <u>Ecology Regional Office</u>



Ecology staff can help (cont)

- Compliance Inspectors can help with questions about your responsibilities as a dangerous waste generator.
- Toxics Reduction staff can help with questions about reducing and recycling dangerous waste.

Getting Started

You'll need these materials

- Dangerous Waste Regulations
 - WAC 173-303
- For the Designation exercises
 - Designation checklist*
 - Material Safety Data Sheets (MSDS)* for Red Primer and Zip Strip™
 - *See the Attachments Folder for copies

[Note: hyperlinks only work when the slideshow is running.]



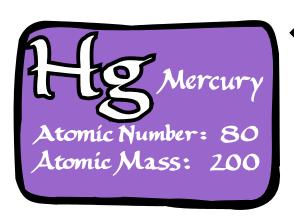
Getting Started/Feedback

- Attachments Folder also has
 - Quick Reference Guide for DW Generators
 - List of acronyms
 - Emergency coordinator form
 - Draft training plan
 - Weekly facility inspection checklist
 - Related websites
 - Sample Uniform Hazardous Waste Manifest
- Questions about DW management?
 - Call your <u>local Ecology office</u>
- Feedback on this tutorial?
 - Mariann Cook Andrews at: maco461@ecy.wa.gov

Get immediate updates by joining these listservs

- Dangerous Waste Rules
 - http://listserv.wa.gov/cgi-bin/wa?SUBED1=DW-RULES&A=1
- Dangerous waste permits
 - http://LISTSERV 15.0 DWFACILITIES-PUBLIC-NOTICE List at LISTSERV.WA.GOV
- Shoptalk Online, newsletter for Dangerous Waste managers
 - http://listserv.wa.gov/cgi-bin/wa?SUBED1=SHOPTALK-NEWSLETTER&A=1
- Keep your e-mail address up-to-date.

Other important rules



- Ban on sales of mercurycontaining products
 - (RCW 70.95M)
 - http://www.ecy.wa.gov/mercury

- ❖ Electronic waste recycling (WAC 173-900)
 - http://www.ecy.wa.gov/programs/ swfa/eproductrecycle/



Other important rules (cont.)



- Emergency Planning and Community Right to Know (EPCRA)
 - Requires all businesses to plan for emergencies and report chemical information (WAC 118-40)
 - Part of SARA—Title III
- http://www.ecy.wa.gov/epcra/index.html

Dangerous Waste 101

Putting it all into context



Federal? State?

TSCA – RCRA – CERCLA – SARA/EPCRA?

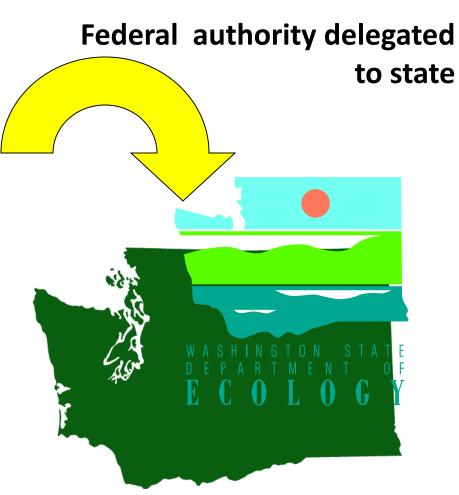
How does it all fit together?

What do we mean by "cradle to grave" management?

Federal/State Laws & Rules



Washington state rules and federal rules are not exactly the same. The state adds some requirements and uses some different terms.



Then and Now

- "Dangerous" waste in "the good old days"
 - 1,200 tons manure/day in New York City
 - 13,000 dead horses/year
- People thought bad smells = disease





Dangerous Waste Now

- Tremendous growth in chemicals after WWII
- ❖ 75,000+ chemicals in use in US by 1976
- Need for a registry of chemicals
 - Provides Material Safety Data Sheets (MSDS)

Toxic Substances
Control Act
"TSCA"
(1976)



- Where to put byproducts and wastes?
- Dumping polluted rivers and drinking water
- Need to protect health from disposal

Resource
Conservation &
Recovery Act
"RCRA" (1976)



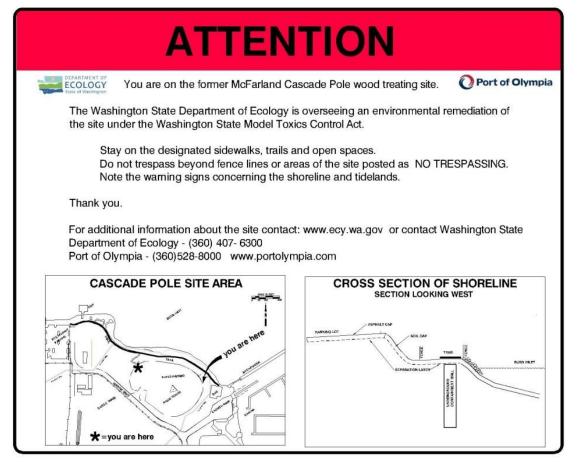
Cuyahoga River, Ohio on fire – again

- When disposal isn't disposal
- Need to prevent the "back door" solution and "fly-by-night" transporters



Comprehensive Environmental Response, Compensation & Liability Act CERCLA (1980)

Recontamination

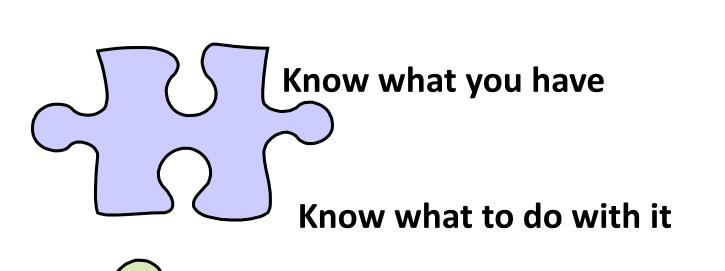


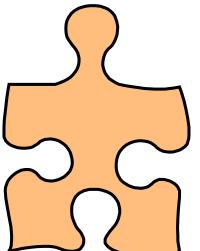
Superfund Amendments & Reauthorization Act – SARA (1986)

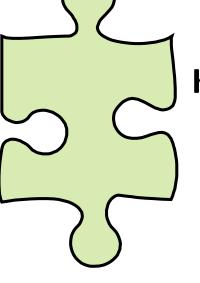
- ❖No fatalities, so not the worst, but still...
- You can't depend on "What usually happens is..."



Need to Know

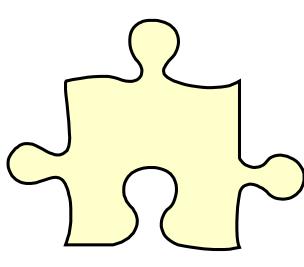




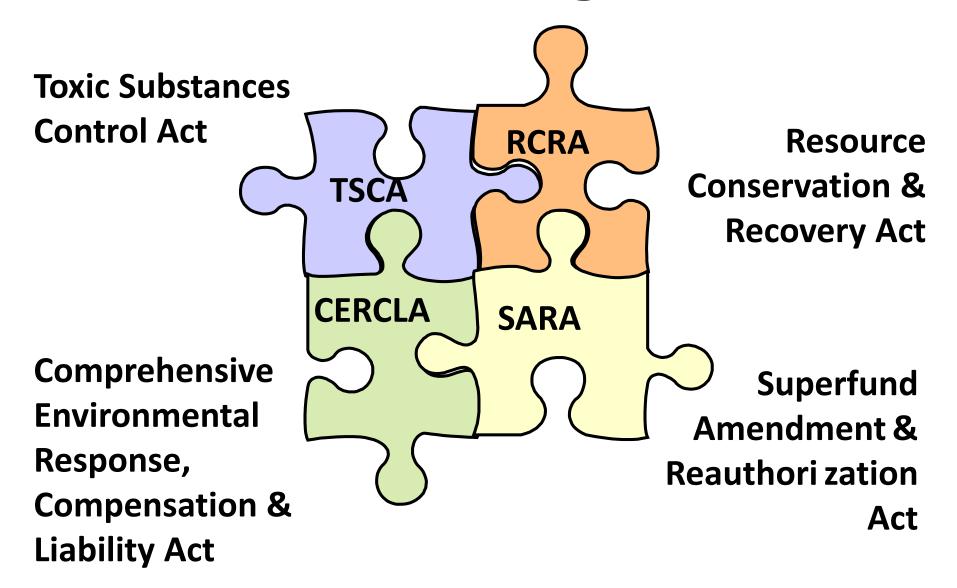


Know where it goes

Know what happens later

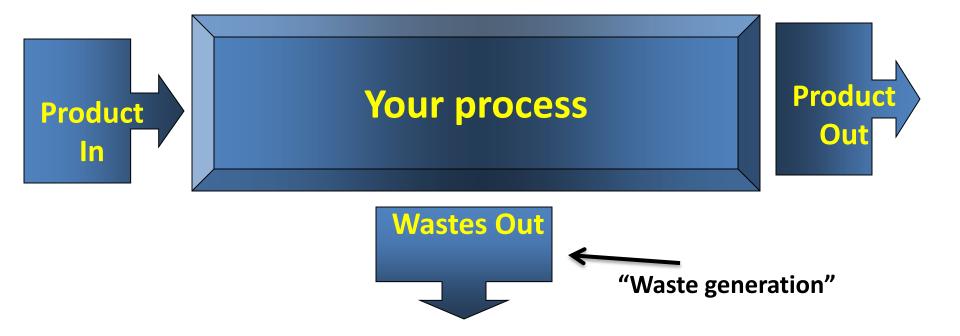


How it fits together



"Cradle to Grave" Management

- Know what comes in
- Know what happens to it
- Know what goes out and where it goes



Chemicals coming in

- Product until it is used
- ❖ Waste after use
- Know what you have
- Know where it is
- Know how long you've had it



Chemicals going out

- What is it? (<u>Identification</u> and <u>Designation</u>)
- ❖What harm can it do? (Risk labeling)
 - Tell the next guy in line (<u>Coding</u>)
- ❖ Manifests the paper trail
 - Who did you give it to?
 - What did they do with it?
 - How do you know that?



Risk-based Regulation

- The more waste you have, and the more hazardous it is, determines your generator status.
 - Small Quantity Generator
 - Medium Quantity Generator
 - Large Quantity Generator
- Your status determines what you have to do for:
 - Storage
 - Labeling
 - Employee training
 - Paperwork



How much?

- Measure your waste <u>each</u> month
 - · Must be actual count, not an average
 - Largest monthly amount in a year = generator

status for that year

- ❖What do you count?
 - All dangerous waste on-site
 - Include waste in work areas
- ❖What don't you count?
 - "Excluded" wastes



Dangerous Waste Rules Ch. 173-303 WAC

- ❖Use them to find out:
 - How to figure your generator status
 - Specifics on accumulation (storage) and labeling
 - How to designate
 - How to manifest for transport
 - Definitions
 - Lists of chemicals